

I, Matthew C. Bernstein, declare as follows:

1. I am an attorney with the law firm of Perkins Coie LLP, counsel of record for Plaintiffs Jiaxing Super Lighting Electric Appliance Co., Ltd. and Obert, Inc. I submit this Declaration in support of Plaintiffs' Motion for Sanctions.

2. Attached hereto as Exhibit 1 is a true and correct copy of Defendants CH Lighting and Ruising's Third Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories, served on March 30, 2021.

3. Attached hereto as Exhibit 2 is a true and correct copy of the June 3, 2021 Transcript of Qingbo (Jack) Jiang, Designated Representative.

4. Attached hereto as Exhibit 3 is a true and correct copy of a June 22, 2021 email from Abigail Gardner to Robert Earle with an attachment of a Discovery Issue Chart.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Transcript of the July 12, 2021 Discovery Hearing in Civil Action No. W-20-CV-18.

6. Attached hereto as Exhibit 5 is a true and correct copy of the document bearing Bates stamp CHLIGHTING-SL_0059917.

7. Attached hereto as Exhibit 6 is a true and correct copy of a July 24, 2021 email from Robert Hill to Robert Earle.

8. As the follow-up August 25, 2021 hearing approached, Defendants' counsel proposed that in exchange for Plaintiffs dropping the second discovery dispute, Defendants would agree not to raise any opinion of counsel at trial. This agreement was memorialized and read into the record on August 25, 2021, and is contained in the Proposed Pretrial order at Section IV(E) (p. 16).

9. Attached hereto as Exhibit 7 is a true and correct copy of the September 8, 2021 Transcript of Qingbo (Jack) Jiang.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 13th day of September 2021.

/s/ Matthew C. Bernstein

Matthew C. Bernstein

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE]- Document Filing System, to all counsel of record on this 13th day of September 2021.

By: /s/ Matthew C. Bernstein
Matthew C. Bernstein